LOCAL GOVERNMENT
BOUNDARY COMMISSION
FOR ENGLAND

REVIEW OF
GREATERT LONDON, THE LONDON BOROUGHS
AND THE CITY OF LONDON

LONDON BOROUGH OF SOUTHWARK
Boundaries with: LEWISHAM LB
TOWER HAMLETS LB

REPORT NO. 637
LOCAL GOVERNMENT

BOUNDARY COMMISSION

FOR ENGLAND

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LOCAL GOVERNMENT BOUNDARY COMMISSION FOR ENGLAND

CHAIRMAN
MR K F J ENNALS CB

MEMBERS
MR G R PRENTICE

MRS H R V SARKANY

MR C W SMITH

PROFESSOR K YOUNG
INTRODUCTION

1. This report contains our final proposals for the London Borough of Southwark's boundaries with the London Boroughs of Lewisham and Tower Hamlets. We have proposed no change to Southwark's river boundary with Tower Hamlets, and only limited change to its boundary with Lewisham, with the intention of removing anomalies, for example, where properties are divided by the boundary.

2. On 1 April 1987 we announced the start of a review of Greater London, the London boroughs and the City of London as part of the programme of reviews we are required to undertake by virtue of section 48(1) of the Local Government Act 1972. We wrote to each of the local authorities concerned.

3. Copies of our letter were sent to the adjoining London boroughs; the appropriate county, district and parish councils bordering Greater London; the local authority associations; Members of Parliament with constituency interests; and the headquarters of the main political parties. In addition, copies were sent to the Metropolitan Police and to those government departments, regional health authorities, electricity, gas and water undertakings which might have an interest, as well as to local television and radio stations serving the Greater London area and to a number of other interested persons and organisations.
4. The London boroughs and the City of London were requested to assist us in publicising the start of the review by inserting a notice for two successive weeks in local newspapers so as to give a wide coverage in the areas concerned.

5. A period of seven months from the date of our letter was allowed for all local authorities and any body or person interested in the review to send us their views on whether changes to the boundaries of Greater London authorities were desirable and, if so, what those changes should be and how they would serve the interests of effective and convenient local government, the criterion laid down in the 1972 Act.

OUR APPROACH TO THE REVIEW OF GREATER LONDON

General

6. As with our previous London borough reports, we have thought it appropriate to commence with some general considerations on the Review of London which have been raised by our examination of Southwark and other inner London borough areas.

7. We took the opportunity in our Report No 550, "People and Places", to explain in some detail the approach we take to our work and the factors which we take into consideration when conducting reviews, including the guidelines given to us by the Secretary of State (set out in Department of the Environment Circular 20/86 in the case of the reviews of London).

8. Subsequently, in July 1988, we issued a press notice, copies of which were sent to London boroughs, explaining the manner in which we proposed to conduct the review of London boundaries. In the notice we said that, from the evidence seen so far, this was unlikely to be the right time to advocate comprehensive change in the pattern of London government - although the notice listed a number of submissions for major changes to particular boundaries which had been made to the Commission, some of which
the Commission had itself foreseen in "People and Places". These and other major changes to particular boundaries are being considered by the Commission as part of its Review.

Wider London Issues

9. When we commenced our review in 1987, we received a number of suggestions advocating radical change to certain London boroughs and to the City of London, including, in some cases, their abolition. Some of these suggestions have engendered considerable publicity and support from residents of the areas concerned, many of whom wrote to us, or signed or submitted petitions.

10. The reasons given for proposing radical change have been varied. Some respondents felt that the authorities in question were either too large to represent the essentially local communities within their areas, or that they encompassed communities of unlike socio-economic complexion which had little or no community of interest, or both. Others felt that their particular communities had little or no affinity with their local authority, and a number suggested that they had been disadvantaged in terms of service provision by the focusing of local authority resources towards the more stressed areas of their boroughs.

11. With only a few exceptions, a common feature of the suggestions for radical change was, perhaps inevitably, that the respondents sought either a return to the pre-1965 pattern of boundaries in their areas, or different amalgamations of the former authorities from those brought about by the London Government Act 1963.

12. We do not doubt the strength and sincerity of the feelings expressed by those who have written to us seeking radical change; and we consider each case on its merits, having regard to the guidelines within which we work. The campaigns for major change,
such as have been suggested by the Dulwich Conservative Association in the context of this review of Southwark's boundary with Lewisham, and Lambeth's boundary with Southwark on which we have already reported to you, make us aware of the strength of feeling towards the local authorities in certain parts of London. However, we need to consider the extent to which the underlying reasons for proposals for radical change are a consequence of the size, shape or boundaries of a borough, rather than the result of the particular policies and priorities of its present council. We hold the view that it is not our function to make changes to local authority boundaries for the purposes of influencing policies towards services in any area. That is the responsibility of the council to its electorate.

13. Our guidelines request us to consider the community of interest in an area. We are aware of the feelings of separation and alienation which sometimes exist between parts of the same borough. Together with the wishes of the people, as expressed to us, such feelings may illuminate the extent to which people view their local authority as a single unit to which they can identify. However, in the context of a local government pattern consisting of authorities of substantial size, it is impossible (even if it were desirable) for any authority to conform to a particular homogenous grouping of residents. In practice, all local authorities, irrespective of size, contain a degree of social diversity, and contain minority groups. Since the former authorities were therefore often the product of the amalgamation of areas with different characteristics, the pattern of authorities created in 1965 inevitably shows considerable socio-economic diversity within most of them.

14. We regard it as impossible within the remit of the current review to consider in detail the socio-economic characteristics of areas within the present boroughs. We are aware of the claims that revenue raised in one part of a borough is spent in other parts, or that councillors favour a particular area of a borough at the expense of others. We consider that it would be very
difficult to prove or disprove these assertions, especially as the exercise would need to extend over several years to be meaningful. In any event, the determination of spending priorities is entirely a policy matter for each local authority within the overall statutory framework and financial constraints set by Parliament. It is not for us to seek to influence such questions through the alteration of boundaries.

15. We are also aware that the splitting of an authority into its component parts (assuming that they can be shown to exist), and the accompanying boundary changes, would often have considerable implications for what might remain of the authority, and for its neighbouring boroughs. We therefore consider that it is right for us to rely on our guidelines from the Secretary of State, which indicate that "...the abolition or creation of a principal area would be appropriate only where the Commission consider that present arrangements clearly fail to provide effective and convenient local government....". This is clearly a very stringent test and, no doubt, is intended to be. It is also applicable to the indirect effects of radical change, which may result in an authority becoming unviable, with consequential effects on the structure and pattern of neighbouring authorities.

16. Our view remains that this review is not the right occasion for a fundamental reappraisal of the extent of London or the pattern of London boroughs, which would inevitably raise questions about the nature and structure of London government. However, we do see it as very much part of our role to identify and record any general issues which arise and which may need to be considered in any more fundamental review of London in the future.

THE BOUNDARIES COVERED BY THIS REPORT

17. This report concerns Southwark's boundary with Lewisham, with the exception of that part of it in the vicinity of Crystal Palace, and its river boundary with Tower Hamlets. Our final
proposals for Southwark's boundary with Lambeth have already been submitted to you (Report No 624), as have our final proposals for the Council's boundaries with Bromley, Lambeth and Lewisham in the Crystal Palace area (Report No 632). We have considered Southwark's river boundary with the City of London as part of our review of that authority, which will be the subject of a separate report.

THE INITIAL SUBMISSIONS MADE TO US

18. In response to our letter of 1 April 1987, we received representations from the London Boroughs of Southwark and Lewisham. Responses were also received from the Metropolitan Police, Dulwich Conservative Association and a member of the public.

OUR DRAFT AND FURTHER DRAFT PROPOSALS AND THE RESPONSES TO THEM

19. In addition to our letter of 1 April 1987, we published two further consultation letters in connection with this review of Southwark's boundaries with Lewisham and Tower Hamlets. The first, announcing our draft proposals and interim decisions to make no proposals, was published on 20 March 1991. Copies were sent to all the local authorities concerned and to all those who had made representations to us. We arranged for a notice to be published announcing our proposals and interim decisions. In addition, Southwark, Lewisham and Tower Hamlets were asked to place copies of this notice at places where public notices are customarily displayed. They were also asked to place copies of our letter on deposit for inspection at their main offices for eight weeks. Comments were invited by 15 May 1991.

20. We received a total of ten responses to our draft proposals letter: comments were received from Southwark and Lewisham, Port of London Properties Ltd, Thames Water Utilities Ltd, the Metropolitan Police, Millwall Football and Athletic Company, the Silwood Estate Tenants' and Residents' Association and two local
residents. The London Waste Regulation Authority indicated that it had no observations to make.

21. Our second letter, announcing our further draft proposals, was issued on 4 December 1991 and received similar publicity. Copies were sent to all those who had made representations to us. Comments were invited by 12 February 1992.

22. In response to our further draft proposals letter, we received comments from Southwark and Lewisham. The Metropolitan Police stated that they had no comments to make.

SUGGESTIONS FOR CHANGE AND OUR CONCLUSIONS

SOUTHWARK'S RIVER BOUNDARY WITH TOWER HAMLETS

23. We received no suggestions for change to the river boundary between Southwark and Tower Hamlets. We considered the boundary satisfactory and therefore took an interim decision to make no proposals.

24. Our interim decision was published as part of our draft proposals letter of 20 March 1991. We received no comments in response and have decided to confirm as final our interim decision to propose no change to this boundary.

SOUTHWARK'S BOUNDARY WITH LEWISHAM

(a) New Borough

25. In its response to our initial letter of 1 April 1987, the Dulwich Conservative Association suggested the creation of a new borough, comprising the southern parts of Southwark and Lambeth, and two wards of Lewisham. It also suggested the creation of an urban development corporation, comprising the northern parts of Southwark and Lambeth.
26. The Association expressed the view that effective and convenient local government had broken down in Southwark and Lambeth, because existing boundaries had proved to be inappropriate. It commented that the southern parts of Southwark and Lambeth have more in common with each other in terms of community of interest than with the northern parts of both boroughs. The Association considered that a fundamental review of the boundary was needed, and believed that local services would be improved if a new borough were to be created from the southern parts of Southwark and Lambeth, and also part of Lewisham.

27. We gave careful consideration to the Dulwich Conservative Association's suggestion. While acknowledging that there may be scope for improvements to the delivery of local government services within Southwark, Lambeth and Lewisham (or, indeed, within many other local authorities), we found no evidence to suggest that the perceived shortcomings in service provision were a consequence of the size, shape or boundaries of the boroughs.

28. We have no powers to propose the creation of an urban development corporation and were therefore unable to respond to that part of the Association's suggestion.

29. In the absence of evidence to show that the socio-economic structure and geography of Southwark, Lambeth and Lewisham hindered effective and convenient local government in South London, or that the present arrangements in those boroughs clearly fail to provide effective and convenient local government, we took an interim decision to make no proposals.

30. In its response to our draft proposals letter, the Dulwich Conservative Association reiterated its suggestion for the creation of a new borough. It accepted that the creation of an urban development corporation was outside our remit, but suggested that we should still relay its request to the Secretary of State.
31. We reconsidered the points made in support of the Association's suggestion. However, for the reasons given in paragraphs 14, 27 and 29 above, we considered that it would be inappropriate to propose major change to the structure of local government in London in the context of this review, and that the Dulwich Conservative Association's suggestion could only reasonably be considered as part of a wider review of the pattern of London boroughs. We have therefore decided to confirm our interim decision as final.

(b) Plough Way (Surrey Quays)  

Draft proposal

32. Southwark suggested realigning the boundary along Plough Way from Yeoman Street to the west side of St George's Wharf, then north-west to join the existing boundary. Lewisham agreed with Southwark's suggestion for a realignment to follow Plough Way from Yeoman Street. However, it suggested rejoining the existing boundary at the west side of East Country Yard.

33. We noted that the existing boundary had been defaced by the realignment of Plough Way, and also that it crosses an infill site adjacent to East Country Yard. We agreed that East Country Yard appeared to relate more to the redevelopment being undertaken to the north, towards the River Thames in Southwark, and that a satisfactory boundary could be provided by following the new line of Plough Way and the northern edge of St George's Square, extending to Southwark's river boundary with Tower Hamlets. We therefore decided to adopt Southwark's suggestion as our draft proposal, subject to a modification in respect of St George's Square.
Final proposal

34. In response to our draft proposals letter, both Southwark and Lewisham indicated that they had no objection to uniting East Country Yard and St George's Wharf in Southwark. The Metropolitan Police and Port of London Properties Ltd supported our draft proposal. We received no other representations, and have decided to confirm our draft proposal as final.

(c) Silwood Estate and Ilderton Road Maps 2 and 3

Draft proposal

35. Southwark suggested uniting the whole of the Silwood Estate in its area, on the grounds that it provides most of the services to residents. It proposed realigning the boundary by following the railway south from South Bermondsey Station to Old Kent Road. Lewisham submitted an identical suggestion for the Silwood Estate. It also suggested a minor realignment of the boundary south of William Evans Home and a minor highway realignment on Ilderton Road.

36. The Metropolitan Police also suggested uniting the Silwood Estate in Southwark. It also proposed a realignment along the north and west sides of Bolina Road and the north side of Zampa Road, to join the existing boundary in Ilderton Road.

37. Lewisham informed us that Southwark provided most of the services to residents of the Silwood Estate, and we agreed that the estate should be united in a single authority. We also considered that the industrial units between Ilderton Road and the railway south of South Bermondsey Station looked more to Southwark than to Lewisham.

38. Accordingly, we felt that a satisfactory boundary in this area could be provided by adopting Lewisham's suggestion for the boundary to follow the south side of William Evans Home;
Southwark's suggestion for the Silwood Estate; a realignment along the south sides of Bolina Road and Zampa Road; and then Southwark's suggestion for the railway between Zampa Road and Old Kent Road, subject to a side-of-railway alignment. We decided to issue a draft proposal to this effect.

Further draft proposal

39. In response to our draft proposals letter, both Southwark and Lewisham expressed their opposition to parts of our proposed boundary realignment. In the area of the Silwood Estate, both Lewisham and the Metropolitan Police supported our draft proposal. However, Southwark opposed it, and suggested uniting the Silwood Estate in Lewisham, by realigning the boundary along Silwood Street and Eugenia Road.

40. We also received a petition from the Silwood Estate Tenants' and Residents' Association, signed by 393 Lewisham tenants, expressing their wish to stay in Lewisham. The Tenants' and Residents' Association pointed out that the larger part of the estate is currently in Lewisham, and that Lewisham provides the Youth Club, Community Flat, Tenants' Hall and Family Centre on the estate. In addition, one resident of the estate opposed any change in the area, while another expressed the view that tenants in the Southwark part would support the estate being united in Lewisham.

41. The Metropolitan Police also supported that part of our draft proposal for Bolina Road and Zampa Road. However, it was opposed by both Lewisham and Southwark, which supported Lewisham's alternative suggestion to unite the industrial units to the west of Bolina Road in Lewisham.

42. Lewisham expressed the view that the industrial units looked more to its area than to Southwark, and commented that it was attempting to resolve the environmental problems associated with Bolina Road, which is subject to unauthorised dumping.
Furthermore, the Council considered that Bolina Road, together with Senegal Fields, should remain in Lewisham, given that, following extensive negotiations with the Council, the Fields are to be the location of a new stadium for Millwall Football Club. Lewisham referred to the strong community ties which the Club has with its Borough. It also commented that its Council would wish to ensure the most effective environmental management of the area around the football ground, and that this could best be achieved if Bolina Road and Senegal Fields remained in Lewisham.

43. The Millwall Football and Athletic Company opposed our draft proposal for Zampa Road and Bolina Road, on the grounds that it wished Lewisham to retain responsibility both for the site of its new stadium and for the adjoining land. It also referred to the football club's close links with Lewisham and Lewisham residents.

44. Neither Southwark nor Lewisham opposed that part of our draft proposal for the Ilderton Road area. Indeed, Lewisham supported our view that the industrial units between Ilderton Road and the railway, south of Stockholm Road, look more to Southwark than to Lewisham.

45. Thames Water Utilities Ltd suggested a centre of railway alignment from Old Kent Road to Zampa Road. The Metropolitan Police suggested retaining the existing boundary in Ilderton Road, and then linking it to our draft proposal by an westwards extension of our proposed Zampa Road realignment. The Metropolitan Police commented that implementation of our draft proposal would result in officers from Deptford Police Station having to enter the Southwark divisional area to gain access to the Winslade Estate, to the east of the railway line. This, it was suggested, could result in difficulties in policing the Winslade Estate.

46. We noted that residents of the Silwood Estate opposed our draft proposal, and that each local authority now wished the estate to be united in the other's area. The existing boundary
is clearly anomalous, splitting the Silwood Estate and its community between Southwark and Lewisham, and we reaffirmed our view that it would be in the interests of effective and convenient local government for the estate to be united in one authority. However, as the major part of the estate is located in Lewisham, and residents had expressed a strong desire to remain in that Borough, we decided to withdraw this part of our draft proposal and to adopt, as our further draft proposal, Southwark's alternative suggestion to unite the estate in Lewisham, subject to minor modifications to make better use of ground detail.

47. Lewisham and Millwall Football and Athletic Company had opposed our draft proposal for Bolina and Zampa Road. We noted that outline planning permission had been granted for the development of the Football Club's new stadium at Senegal Fields, on the south east side of Bolina Road, and that access to the ground would be from that road. We agreed that it would facilitate local authority liaison with the police over crowd control, and be in the interests of effective traffic management, for the whole of Bolina Road to be within one authority's area. We therefore decided to withdraw this part of our draft proposal, and to adopt a further draft proposal, based on Lewisham's suggestion, to unite the industrial units to the west of Bolina Road in its authority, subject to a north side of road alignment in Bolina Road to the north east of the industrial units.

48. The Metropolitan Police had expressed concern that operational difficulties might arise from our draft proposal for Ilderton Road. However, we considered that these could be overcome by appropriate administrative changes, or through local co-operation between divisional areas.

49. We also considered the suggestion by Thames Water Utilities Ltd to realign the boundary to the centre of the railway between Old Kent Road and Zampa Road. However, our draft proposal was tied to firm ground detail and we considered that no case had
been made to justify such a change. We therefore decided to retain that part of our draft proposal to the west of the railway, between Zampa Road and Old Kent Road and, also, the minor realignment to the boundary south of William Evans Home.

Final proposal

50. Lewisham supported our further draft proposal to unite the Silwood Estate and the industrial units to the west of Bolina Road in Lewisham. Southwark indicated that, as our further draft proposal for the Silwood Estate had been based on its suggestion, the Council had no further comments. The Metropolitan Police had no comments.

51. We received no other representations, and have decided to confirm our further draft proposal as final.

(d) Fyffes Factory

Draft Proposal

52. Southwark and Lewisham submitted identical suggestions to resolve the current division of the Fyffes Factory, by realigning the boundary from the end of Kitto Road, along the south side of the warehouse to the railway line, and then along the west side of a garage block to rejoin the existing boundary at the rear of Nos 27 and 29 St Asaph Road.

53. The existing boundary cuts through the centre of a warehouse and divides a garage block from the houses it serves. We felt that a satisfactory boundary could be found by following the railway adjacent to the factory, as suggested by the two Councils. We therefore decided to adopt their suggestion as our draft proposal, subject to a modification to tie the boundary to firm ground detail.
Final proposal

54. Both Southwark and Lewisham indicated that they had no objection to our draft proposal. It was supported by the Metropolitan Police. Thames Water Utilities Ltd queried the fact that we had proposed a realignment to the centre of the railway in this case, but not in that of Ilderton Road.

55. We noted Thames Water's comment on our draft proposal, which follows the centre of the railway for a short stretch, as there are no other obvious ground features to which to tie it. However, we received no other representations, and have decided to confirm our draft proposal as final.

(e) Honor Oak Park Railway Sidings
(f) Lordship Lane/London Road
(g) Sydenham Hill/Kirkdale
(h) Sydenham Hill/Crescent Wood Road

56. Lewisham suggested minor boundary realignments in these areas. However, we considered that they would not result in any significant improvement in effective and convenient local government. We therefore took an interim decision to make no proposals.

57. Our interim decision was published as part of our draft proposals letter of 20 March 1991. We received no comments or any further suggestions for change, and have decided to confirm as final our interim decision to make no proposals.

ELECTORAL CONSEQUENCES

58. Our final proposals will have electoral consequences for the local authorities affected by this review. The details of our proposals for changes in electoral arrangements are described in Annex B to this report.
CONCLUSIONS

59. We believe that our final proposals, which are summarised in Annex C to this report, are in the interests of effective and convenient local government and we commend them to you accordingly.

PUBLICATION

60. A separate letter is being sent to the London Boroughs of Southwark, Lewisham and Tower Hamlets asking them to deposit copies of this report at their main offices for inspection for a period of six months. They are also being asked to put notices to that effect on public notice boards. Arrangements have been made for similar notices to be inserted in the local press. The text of the notice will explain that the Commission has fulfilled its statutory role in this matter and that it now falls to you to make an Order implementing the proposals, if you think fit, though not earlier than six weeks from the date our final proposals are submitted to you. Copies of this report, with the maps attached at Annex A illustrating the proposed changes, are being sent to all those who received our draft and further draft proposal letters of 20 March 1991 and 4 December 1991, and to those who made written representations to us.
Signed K F J ENNALS (Chairman)

G R PRENITCE

HELEN SARKANY

C W SMITH

K YOUNG

R D COMPTON
Secretary
2 April 1992
LOCAL GOVERNMENT BOUNDARY COMMISSION FOR ENGLAND

REVIEWS OF GREATER LONDON, THE LONDON BOROUGHS
AND THE CITY OF LONDON

SOUTHWARK LB

AFFECTING THE LONDON BOROUGH OF LEWISHAM

FINAL PROPOSALS

Existing Boundary
Proposed Boundary
Other boundary divisions

Produced by Ordnance Survey for the
Local Government Boundary Commission for England
## CONSEQUENTIAL CHANGES

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SUMMARY OF PROPOSED BOUNDARY CHANGES

Boundary between Lambeth and Southwark

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<td>Silwood Estate and Ilderton Road</td>
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